



February 6, 2006
VIA ECFS

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Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St. SW
Washington DC 20554

RE: **Globalcom, Inc.**
EB Docket No. 06-36
EB-06-TC-060 - Certification of CPNI Filing (02/06/06)

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 30, 2006, Globalcom, Inc. hereby files a copy of its 2006 Annual Compliance Certification of CPNI as required by section 64.2009(e) of the Commission's rules. As directed by the Public Notice, please include this in EB Docket No. 06-36.

Please contact me at 407-740-3006 or croesel@tminc.com if you have any questions about this filing.

Sincerely,

Carey Roesel
Consultant to Globalcom, Inc.

Enclosure

cc: Byron McCoy (byron.mccoy@fcc.gov)
Best Copy and Printing, Inc. (fcc@bcpiweb.com)

CERTIFICATION OF CPNI FILING – FEBRUARY 6, 2006
EB DOCKET NO. 06-36

I, M. Gavin McCarty, certify and state that:

1. I am the Chief Legal Officer of Globalcom, Inc. ("Globalcom") and have personal knowledge of Globalcom's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Globalcom's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. A further statement outlining the Globalcom's operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e)



M. Gavin McCarty, Chief Legal Officer

2.4.2006

Date

G L O B A L C O M

Exhibit A
Statement of CPNI Procedures and Compliance

- (a) Globalcom does not sell or provide affiliates or third parties with access to CPNI. Globalcom restricts access to CPNI to employees with pre-authorized access rights. Globalcom restricts use of CPNI by authorized employees for response to customer requests for repair, maintenance, provision of technical and non-technical support, service upgrades, service support, service features, etc. (i.e., customer support). Globalcom's use of CPNI is within the allowable provisions of 47 C.F.R. 64.2005. Marketing performed by Globalcom is on a limited basis and is marketed to Globalcom's customers on an aggregate basis, making use of the entire Globalcom customer list, or marketing is limited to the category of service offerings already provided by Globalcom to customer (i.e., total service approach). Globalcom provides CPNI to third parties in compliance with valid court orders and subpoenas.
- (b) Globalcom employees are required to sign a confidentiality agreement and rules acknowledgment form. Confidentiality agreements require that employees keep and maintain all Globalcom information, including CPNI, on a strict and confidential basis. Globalcom restricts access to CPNI to employees with pre-authorized access rights. Globalcom trains the employees with access to CPNI on the proper and permissible use of CPNI for customer support. Globalcom disciplines employees in accordance with Globalcom's existing employee disciplinary procedures for failing to follow proper use procedures.
- (c) Globalcom's use of CPNI is within the allowable provisions of 47 C.F.R. 64.2005. Marketing performed by Globalcom is on a limited basis and is marketed to Globalcom's customers on an aggregate basis, making use of the entire Globalcom customer list, or marketing is limited to the category of service offerings already provided by Globalcom to customer (i.e., total service approach). Globalcom's limited access and use of CPNI is recorded and maintained. Access is protected internally by login and password requirements, with tracking of access and use, and limited ability to printout. Records are stored electronically, for a minimum of one year.
- (d) Globalcom does not conduct outbound marketing campaigns with CPNI. Globalcom does not disclose or permit access to CPNI by third parties. In the event Globalcom seeks to conduct outbound marketing campaigns with CPNI, Globalcom will establish a supervisory review and approval process in accordance with 47 C.F.R. 64.2009(d).
- (e) An officer of Globalcom that has personal knowledge that Globalcom has established operating procedures that are adequate to ensure compliance with the FCC's CPNI rules has signed a certificate of compliance. Globalcom's security of CPNI, combined with restricted access and limited use of CPNI (i.e., customer support use), ensures Globalcom that it is in compliance with the FCC's CPNI rules.
- (f) In the event Globalcom seeks to use, sell or disclose CPNI in a manner that requires Customer approval and Globalcom seeks to use an opt-out method for approval, Globalcom will provide timely written notice where an opt-out method fails to perform properly where customer's inability to opt-out is more than an anomaly.

